



REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-2, 4-7, 9-12 and 14-15 are presently active, and Claims 3, 8 and 13 having been previously canceled without prejudice.

In the outstanding Office Action, Claims 1-2, 4-7, 9-12 and 14-15 were rejected under 35 U.S.C. § 102(e) as being anticipated by Silva et al. (U.S. Pat. No. 6,976,210).

Applicants initially wish to thank Examiner James J. Debrow and Primary Examiner Doug Hutton for the courtesy of an interview granted to Applicants' representatives on September 20, 2006, at which time the outstanding issues in this case were discussed. Arguments similar to the ones developed hereinafter were presented and the Examiners indicated that in light of the arguments, they would reconsider the outstanding grounds for rejection upon formal submission of a response.

Regarding the rejection of Claims 1-2, 4-7, 9-12 and 14-15, Applicants respectfully traverse the outstanding grounds for rejection, because in Applicants' view, independent Claims 1, 6 and 11 patentably distinguish over Silva et al. as discussed below.

First, Claim 1 recites, *inter alia*, "converting semantically the document structure ... into a desired document structure **according to ... identification information of a file describing a conversion rule ... , ... the identification information described by the specific markup language in the second document.**" That is, the conversion rule is described in the second document to be converted.

Instead, Silva et al. describes, at column 7, lines 47-52, "Note that since many HTML pages are not well-formed, there may be missing tags, tags for different elements may overlap, etc., the parser must correct such page anomalies. Thus a parser 210 generates an equivalent well-formed version of the source Web page from which a clipping is to be extracted." Silva

et al. shows that the parser 210 to correct page anomalies (missing tags, tags for different elements may overlap, etc.) is included in the web clipping manager 202 (Silva et al., Fig. 2). However, Silva et al. does not disclose that the conversion rule is in the document to be converted. In Silva et al., it appears that the rule is included in the web clipping manager 202 because the parser 210 merely correct page anomalies.

Thus, Silva et al. fails to teach or suggest “converting semantically the document structure … into a desired document structure *according to … identification information of a file describing a conversion rule … , … the identification information described by the specific markup language in the second document,*” as recited in Claim 1.

Second, Claim 1 recites, *inter alia*, “converting *semantically* the document structure … into a desired document structure according to … identification information of a file describing a conversion rule … , … the identification information described by the specific markup language in the second document.”

Instead, Silva et al. focuses on generating an equivalent well-formed version of a source Web page from which a clipping is to be extracted. However, semantics before this conversion is identical to semantics after this conversion.

Thus, Silva et al. fails to teach or suggest “converting *semantically* the document structure … into a desired document structure according to … identification information of a file describing a conversion rule … , … the identification information described by the specific markup language in the second document,” as recited in Claim 1.

Similar arguments set forth above apply to Claims 6 and 11.

Accordingly, independent Claims 1, 6 and 11 patentably distinguish over Silva et al. Therefore, Claims 1, 6 and 11 and the pending Claims 2, 4-5, 7, 9-10, 12 and 14-15 dependent from Claims 1, 6 and 11 are believed to be allowable.

Consequently, in light of the above discussions, Applicants respectfully request withdrawal of the rejection of Claims 1-2, 4-7, 9-12 and 14-15. The application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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